



16711/LAC
D8(m) Policy Ltr 12-2000
20 June 2000

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: GUIDANCE FOR APPROVAL OF SINGLE TANKERMAN - DUAL BARGE CARGO TRANSFERS

1. **PURPOSE.** This policy letter establishes a standard Letter of Alternate Compliance (LAC) and guidance to be used by Eighth Coast Guard District COTPs for granting approval for single tankerman-dual barge cargo transfers.
2. **DIRECTIVES AFFECTED.** None.
3. **BACKGROUND.**
 - a. Standardization of Letters of Alternate Compliance (LAC) has been a topic of discussion for several years within the Eighth Coast Guard District. Historically, COTPs have routinely issued approvals for single tankerman-dual barge oil cargo discharges. Over the past several years, COTPs have struggled with the idea of approving other types of cargoes besides oil and other types of transfers besides vessel-to-facility discharges.
 - b. A recent Natural Working Group (NWG) convened at Marine Safety Office (MSO) Paducah to examine the issue of single tankerman-dual barge oil discharge transfers. The NWG reviewed the cost benefit, risk and spill history associated with such transfers. The NWG recommended standard provisions to be used in LACs for single tankerman-dual barge oil discharges.
 - c. Using a draft LAC submitted by MSO Pittsburgh as a baseline, and incorporating the standard provisions outlined by the NWG report, D8 (m) developed a generic LAC for single tankerman-dual barge oil cargo discharges. The generic LAC also incorporates some optional provisions for other-type cargoes and other-type transfers.
4. **DISCUSSION.**
 - a. This alternative compliance policy is intended to provide a baseline LAC for single tankerman-dual barge oil cargo discharges. Further, it allows COTPs wide discretion when approving any cargo type single tankerman-dual barge discharge or loading.
 - b. Although an *oil* (as defined in 33 CFR 154.105) cargo discharge is the listed example in the enclosed D8 (m) generic LAC, COTPs can adapt the LAC to fit any circumstance. Other cargoes that may be included in the LAC are hazardous materials as defined in 33


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CFR 154.105 or liquefied hazardous gases as defined in 33 CFR 127.005 and listed in Table 127.005. Recommended criteria necessary for single tankerman-dual barge transfers is listed in the LAC, however, COTPs should evaluate each request on a case-by-case basis and require additional criteria if deemed appropriate. Facility-to-vessel loadings and vessel-to-vessel transfers expose a greater risk of pollution than vessel-to-facility transfers and should be scrutinized accordingly.

- c. Prior to issuing a LAC, COTPs should review:
 - (1) The operator and facility spill history.
 - (2) The vessel's transfer procedures to ensure that it contains appropriately outlined provisions for the particular transfer requested.
 - (3) The facility's operations manual to ensure that it contains appropriately outlined provisions for the particular transfer requested.
 - (4) The applicable regulations addressing the type and number of transfer hoses to be used for a particular transfer (i.e., single hose versus dual hose used for loading/discharge).
 - (5) The applicable regulations addressing limitations on the Person In Charge (PIC) (i.e., no person may serve as the PIC in charge of two or more vessels and a facility unless authorized by the COTP).
 - (6) The cargoes being transferred are the same or compatible (i.e., fuel or oily waste transfers should not be conducted concurrent with Liquefied Hazardous Gas).
 - (7) The risk of pollution and the hazards of the product being transferred.
 - (8) The particular characteristics of the cargo that could make nighttime transfer inappropriate (i.e., the ability to see a Liquefied Hazardous Gas release).
- d. When Vapor Control Systems (VCS) are required, calculations must be completed to verify that the receiving end (i.e., the facility if discharging or the barges if loading) has the capacity to handle the additional vapor volume. The facility or vessel VCS calculations must be submitted to the Coast Guard Marine Safety Center for approval.
- e. Generally, LACs should be granted for indefinite periods. Of course, this is provisional upon all required safety conditions being met and in the absence of compelling reasons to limit duration. COTPs are discouraged from limiting duration periods for the sake of conducting systematic CG oversight. Appropriate CG oversight should be accomplished through onsite vessel/facility inspections or monitoring of transfer operations. High-risk chemical transfers should be frequently monitored. However, LACs should be terminated and transfer processes re-evaluated upon change of vessel/facility ownership or significant vessel/facility reconfiguration or design change.

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5. **ACTION.** All Eighth District COTPs shall use the standard Letter of Alternate Compliance, enclosure (1), as a baseline for issuing approval for single tankerman-dual barge cargo transfers. Specific issues such as port restrictions or cargoes other than oil may be incorporated into the compliance letter at the COTP's discretion. Suspension or termination of Letters of Alternative Compliance should be issued in writing if the COTP determines there is just cause to do so.
6. For further information or to answer any questions, please contact LT Frank Rego at (504) 589-3049.


C. T. DESMOND
By direction

Encl: (1) Generic Letter of Alternative Compliance for Single Tankerman-Dual Barge Cargo Transfers

Dist: All Eighth District MSOs, MSU and MSDs
Coast Guard Marine Safety Center



Mr./Ms. Anybody
Any Company
Any Street
Anywhere, USA

Dear Madam or Sir:

Your request dated _____ for an alternative to the requirement listed in Title 33, Code of Federal Regulations (CFR), Part 156.115 (a) *or (b)* is granted. This letter of alternative compliance permits the use of one tankerman as the Person-in-Charge of no more than two (*or an amount approved by the COTP*) barges to be simultaneously engaged in discharge and (*loading operations*). Your company is authorized to conduct this alternative procedure provided the following conditions are met:

1. The cargo being transferred shall be an oil product as defined in 33 CFR 154.105 (*or a hazardous material as defined in 33 CFR 154.105, or a cargo of particular hazard as defined in 33 CFR 126.10, or liquefied hazardous gases as defined in 33 CFR 127.005 and listed in Table 127.005*).
2. No more than two barges (*or an amount approved by the COTP*) may be moored adjacent to each other (manifold-to-manifold) with a ready means of access between the barges. Barges may be moored end-to-end or pump-to-pump so long as there is a mechanical linkage or other means that would enable the tankerman to shut down the pumps on both barges simultaneously from either barge in an emergency.
3. The applicable Facility Operations Manual must specifically address dual transfer operations.
4. The Person-in-Charge of the barges may not be the Person-in-Charge (PIC) of the facility.
5. Critical operations such as hookup, commencement of transfer, or topping off must not occur simultaneously on both barges. The tankerman must be able to monitor each evolution separately and be satisfied that all the appropriate safety precautions are being observed.
6. Barges equipped with Vapor Control Systems (VCS) shall not be allowed to conduct simultaneous cargo discharges at facilities that require vapor collection unless each vessel is equipped with its own separate vapor connection to the facility. This prohibition may be lifted if both barges are owned by the same company and have VCSs that are designed to function while connected together and system pressure drop arrangements have been approved by MSC.

Note: Italicized items are optional

Enclosure (1)

7. Only one transfer hose may be used between the dock and the two barges for discharge and (*loading operations*), unless additional hoses are authorized by the Captain Of The Port (COTP).
8. The Declaration of Inspection (DOI) and pre-transfer conference must address the multiple vessel transfer. The names of both barges must be indicated on the DOI or a separate DOI must be completed for each barge.
9. The operations manual and oil transfer procedures must specifically address, in detail, the manner in which the Person-in-Charge will oversee the multiple vessel transfer.
10. A single crossover hose will be used to connect both barges. The hose shall have been inspected and tested within the previous twelve months in accordance with 33 CFR 156.170.
11. The tankerman shall inspect both barges and complete separate Declarations of Inspection for each barge. All deficiencies noted must be corrected prior to commencing any transfer operations.
12. Continuous two-way communications shall be established and maintained with the PIC of the facility.
13. The tankerman must have prior training in this type of operation. The tankerman must have a company letter certifying training and qualification as Person-In-Charge for dual barge simultaneous transfer operations. A copy of this letter shall be readily available for review by Coast Guard personnel upon request during transfer operations.
14. *If approving dual barge **Oil Cargo Loading**, adapt the LAC to include the following applicable requirements:*
 - a. *Both barges must be equipped with an overfill control system meeting the requirements of 33 CFR 155.480.*
 - b. *Unless the barge's design dictates otherwise, cargo must be loaded with the ullage, sounding, and sighting ports securely closed. The gas displaced by the incoming cargo should be vented to the atmosphere via the vent stacks or through high or constant velocity valves, either of which will ensure that gases are taken clear of the cargo deck or through an installed facility VCS. Flame screens fitted to vent stacks to prevent the passage of flame must be regularly checked to confirm that they are clean, in good condition and correctly installed.*
 - c. *Where possible, the completion of loading should be done by gravity. If pumps need to be used to the end, their delivery rate during the "standby" time should be regulated so that the facility control valves can be closed as soon as requested by the barge PIC. The facility control valves must be closed before the barge's valves.*

Note: Italicized items are optional

- d. *The PIC must advise the facility when the final tanks are to be topped off and request that the facility, in adequate time, reduce the loading rate sufficiently to permit effective control of the flow on board both barges. After topping off individual tanks on both barges, master valves must be shut, where possible, to provide two valve segregation of loaded tanks. Ullages must be checked to ensure that overflows do not occur as a result of leaking valves or incorrect operations.*
 - e. *When using more than one liquid transfer hose from the shore facility, the facility must be capable of automatically shutting down the cargo flow to each transfer hose simultaneously in the event an upset condition occurs.*
 - f. *Barges equipped with Vapor Control Systems (VCS) shall not be allowed to conduct simultaneous cargo loadings at facilities that require vapor collection unless each vessel is equipped with its own separate vapor connection to the facility. This prohibition may be lifted if both barges are owned by the same company and have VCSs that are designed to function while connected together and system pressure drop arrangements have been approved by MSC.*
 - g. Loading and discharge operations shall not be carried out simultaneously.
15. If approving **LHG Cargo Discharges/Loading**, adapt the LAC to include the following requirement:
- a. *Dual transfer operations for LHG cargoes must be conducted in accordance with 33 CFR 127.1319. In addition to these guidelines, all emergency shutdown systems in place on the barges shall be tested to ensure proper operation prior to conducting transfer operations.*
16. If approving **Chemical Cargo discharges**, adapt the LAC to include the following requirements:
- a. *Dual transfer operations for barges, which carry in bulk any of the liquids or liquefied gases listed in 46 CFR Table 151.05, must be conducted in accordance with 46 CFR 151.20. In addition to these guidelines, barges discharging cargoes having toxic properties, must comply with the special requirements found in 46 CFR 151.50.*
 - b. *Barges equipped with Vapor Control Systems shall not be allowed to conduct simultaneous chemical cargo discharge that require vapor collection unless each vessel is equipped with its own separate vapor connection to the facility. This prohibition may be lifted if both barges are owned by the same company and have VCSs that are designed to function while connected together and system pressure drop arrangements have been approved by MSC.*
17. ***Any additional restrictions or requirements.***
- a. LACs for single tankerman-dual barge **chemical cargo loadings** should not be granted unless the cargo is non-toxic or does not represent a significant hazard.

Note: Italicized items are optional

This Letter of Alternative Compliance applies only to transfer operations within (SPECIFIC COTP ZONE) *or between ACME towing and GENERIC facility* and will continue in force until it is cancelled in writing.

Sincerely,

ANY COTP
Rank, U.S. Coast Guard
Captain of the Port

Note: Italicized items are optional